



PROGRESS REPORT NO. 176

TO: Robert Tan, U.S. Environmental Protection Agency (EPA) – via Electronic mail
Bonnie Arthur, EPA – via Electronic mail

FROM: Denise Mills, Teck American Incorporated (TAI)

Cc: Kris McCaig, TAI – via Electronic mail
Rob Orr, TAI – via Electronic mail

DATE: March 10, 2021

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) – Progress Report No. 176 Month Ending February 2021

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Soil Amendment Technology Evaluation Study (SATES):

The third-party data validator completed validation of the analytical results for the Phase II bench-scale testing time point 3 (t3) soil samples, collected on March 11, 2020, in January 2021. In February, following its initial evaluation of the results, The Ohio State University recommended reanalysis of a portion of the t3 samples to confirm the analytical results for *in vitro* bioaccessibility for lead in some of the amendment test pots prior to finalizing the dataset, which has delayed delivery of the validated Phase II dataset for transmittal to EPA. The reanalysis was completed in February, therefore TAI now plans to submit the validated Phase II dataset to EPA in March 2021. TAI is preparing the draft Phase II Data Summary Report (DSR) and a statistical analysis report that will discuss evaluate the bench-scale testing and effects of the soil treatments tested in the lab.

Planning continued during the month for the Phase III amendment application to the SATES test plots and the initial Phase IV soil sampling event which will be completed in April and May 2021, respectively, as documented in the EPA-approved Work Plan Change Request No. 2.

Baseline Ecological Risk Assessment (BERA) – TAI continued working on the Pre-draft terrestrial BERA (the Upland BERA), for submittal to EPA in June 2021. This component of the BERA will be revised based on EPA input and incorporated into the Draft Site-wide BERA at a later date.

Remedial Investigation (RI) Report – TAI began working on the Pre-draft RI Report focused on the UCR upland areas (the Upland RI), for submittal to EPA in July 2021. This pre-draft RI component will be revised based on EPA input and incorporated into the Draft Site-wide RI at a later date.

2019 Phase 3 Sediment Study:

2019 Phase 3 Sediment Study DSR – TAI submitted the draft DSR to EPA for review and comment on December 23, 2020. As of this writing, TAI received comments from EPA on the draft DSR on March 2, 2021.

Bioassay Testing – In addition to data previously provided by EPA, via the U.S. Geological Survey Columbia Environmental Research Center (CERC), for the Phase 3 bioassay split sample program, CERC provided total recoverable metals data to EPA and TAI on January 8, 2021 and provided total organic carbon data from the bioassay split samples on February 2, 2021. Following a call between EPA and TAI on December 17, 2020 regarding quartz sand bioassay auxiliary control sample results from Pacific EcoRisk, CERC sent quartz sand and reference samples to ALS on January 7, 2021 and January 27, 2021, respectively, for total recoverable metals and total organic carbon analysis. TAI continued evaluation of the auxiliary sand control sample results through the month, and has scheduled a call with EPA's technical team on March 17, 2021 for further discussion of the PER and CERC quartz sand control results.

Human Health Risk Assessment (HHRA) – TAI received the Final HHRA from EPA on February 11, 2021, and received Appendix 2 to the Final HHRA from EPA for review on February 3, 2021.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4515.